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IN THE U.S. DISTRICT COURT FOR THE EASTERN  
DISTRICT OF VIRGINIA

Compliant Under Civil Rights Act 42 USC § 1983

ACTION NUMBER: 1:20CV45 LMB/IDD

TROY L. SMITH  
Plaintiff(s)

vs.

DIRECTOR - VADOC - HAROLD CLARKE  
(Hampton Roads Regional Jail)  
Superintendent: John / Jane "DOE"  
Asst Superintendent: John / Jane "DOE"  
Major: Felicia Cowans  
Captain & Chief of Security:  
Sergeant: STEVE WHITEHEAD (Unit Sergeant)  
Sergeant: T. EVERETTE (Unit Sergeant)  
Sergeant: E. HERELLE (Records)  
Sergeant: — JOHNSON (Unit Sergeant)



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CO — Budd (POD OFFICER DAY SHIFT)  
C.O. C. Anderson (POD OFFICER NIGHT SHIFT)  
MASTER Jail OFFICER: N. Perry (CLASSIFICATION)  
Sergeant: C. Dickerson (CLASSIFICATION)  
OFFICER: — Insley (POD CLASSIFICATION)  
INTERNAL AFFAIRS: LT. Phillips (LIEUTENANT IA)  
INTERNAL AFFAIRS: — Cox (OFFICER IA)  
Sergeant: — Copeland (GRIEVANCE Specialist)  
DON: K. Barton (DIRECTOR OF NURSING)  
ASA: APRIL GREEN (HEALTH SERVICE Admin)  
DOCTOR: DR. MERANO  
RN: T. HARRIS (REG. NURSE)  
CMT: A. HARRISON (CERT. MED TECH)  
Medical Security/Supervisor: LT. K. MACK  
RN: — Phifer (REG. NURSE)  
Charge Nurse: John / Jane "DOE"  
Defendants)

I.

1.) Parties: Troy L. Smith # 272086  
Pendleton Correctional Facility  
4490 West Reformatory Road.  
Pendleton, IN 46064



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2) Director VA DOC HAROLD CLARKE

PO BOX 26963

Richmond, VA 23261

3) Hampton Roads Regional Jail

2690 Elmhurst Lane

Portsmouth VA. 23701

4) Supt. John / JANE "DOE"

2690 Elmhurst Lane (HARRT)

Portsmouth VA. 23701

5) Asst. Supt. John / JANE "DOE"

2690 Elmhurst Lane (HARRT)

Portsmouth VA. 23701

6) Major Felicia Cowans

2690 Elmhurst Lane (HARRT)

Portsmouth VA. 23701

7) Captain & Chief of Security T. Barnes

2690 Elmhurst Lane (HARRT)

Portsmouth VA. 23701

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8.) Sergeant STEVE Whitehead (Unit Sergeant)  
2690 Elmhurst Lane (HART)  
Portsmouth VA. 23701

9.) Sergeant T. EVERETTE (Unit Sergeant)  
2690 Elmhurst Lane (HART)  
Portsmouth VA. 23701

10.) Sergeant E. MORELLE (Records)  
2690 Elmhurst Lane (HART)  
Portsmouth VA. 23701

11.) Sergeant — Johnson  
2690 Elmhurst Lane (HART)  
Portsmouth VA. 23701

12.) OFC. — Buckel (OFFICER)  
2690 Elmhurst Lane (HART)  
Portsmouth VA. 23701

13.) OFC. C. Anderson (OFFICER)  
2690 Elmhurst Lane (HART)  
Portsmouth VA. 23701

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14) MJO. N. Perry (Classification)

2690 Elmhurst Lane

Portsmouth VA. 23701

15) Sergeant C. Dickerson (Classification)

2690 Elmhurst Lane (HRRJ)

Portsmouth VA. 23701

16) Officer — Insley (Classification Officer)

2690 Elmhurst Lane (HRRJ)

Portsmouth VA. 23701

17) Internal Affairs LT. Phillips (Lieutenant IA)

2690 Elmhurst Lane (HRRJ)

Portsmouth VA. 23701

18) Internal Affairs — Cox (Officer IA)

2690 Elmhurst Lane (HRRJ)

Portsmouth VA. 23701

19) Sergeant — Copeland (Grievance Specialist)

2690 Elmhurst Lane (HRRJ)

Portsmouth VA. 23701



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20) DIRECTOR OF NURSING (DON) K. BARTON  
2690 Elmhurst Lane (HRRT)  
Portsmouth VA. 23701

21) Health Service Admin "April Green" (HSA)  
2690 Elmhurst Lane (HRRT)  
Portsmouth VA. 23701

22) DOCTOR - DR. MERANO  
2690 Elmhurst Lane (HRRT)  
Portsmouth VA. 23701

23) RN T. HARRIS  
2690 Elmhurst Lane. (HRRT)  
Portsmouth VA. 23701

24) RN — Phifer  
2690 Elmhurst Lane (HART)  
Portsmouth VA. 23701

25) CERT MED TECH A. HARRISON  
2690 Elmhurst Lane (HRRT)  
Portsmouth VA. 23701

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26.) Medical Security Supervisor LT. K. MACK  
2690 Elmhurst Lane (HRRT)  
Portsmouth VA. 23701

27.) Change Nurse John / Jane "DOE"  
2690 Elmhurst Lane (HRRT)  
Portsmouth VA. 23701

## II.

28.) (A) Have you EVER begun other law-suits in any STATE OR FEDERAL COURT Relating to your imprisonment? NO

## III.

### GRIEVANCE PROCEDURE

(A) AT WHAT INSTITUTION DID THE EVENTS CONCERNING YOUR CURRENT COMPLAINT TAKE PLACE:

29.) Hampton Roads Regional Jail  
2690 Elmhurst Lane  
Portsmouth VA. 23701

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30) UNIT 3/2 - C-Side Dayroom

31) (B) DOES THE INSTITUTION LISTED IN "A" HAVE A GRIEVANCE PROCEDURE? YES

32) (C) 1) DID YOU FILE A GRIEVANCE ON THIS COMPLAINT? YES

2) IF SO, WHERE AND WHEN? ON OR ABOUT MAY 24-26, 2018 ON ARMARK KIOSK MACHINE.

3) WHAT WAS THE RESULT? Originally Sgt. Whitehead OFFERED NO REMEDY AND CLOSED THE COMPLAINT ON MAY 31, 2018.

4) DID YOU APPEAL? YES

5) RESULT OF APPEAL: # 660656 MAJOR Felicia Cowans intercepted THE APPEAL TO THE SUPERINTENDANT STATING A INCOMPETENT RESPONSE NON-RELATED TO COMPLAINT ABOUT Jail Credits.



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6) CAPTAIN T. BARNES ANSWERED ON FIRST Appeal STATING IF COURTS NEEDED ADDITIONAL INFORMATION THEY WILL CONTACT ME.

33) (1) IF THERE WAS NO PRISON GRIEVANCE PROCEDURE IN THE INSTITUTION, DID YOU COMPLAIN TO THE PRISON AUTHORITIES? YES

34) IF YOUR ANSWER IS YES, WHAT STEPS DID YOU TAKE? WROTE COMPLAINT TO UNIT(3) SERGEANT(S), ALSO REQUESTING CRIMINAL CHARGES, WROTE TO INTERNAL AFFAIRS (IA MS. COX), EXHAUSTED GRIEVANCE PROCEDURE.

35) IV LEGAL CLAIMS

THIS IS A CIVIL ACTION AUTHORIZED BY 42 USC SECTION 1983 TO REDRESS THE DEPRIVATIONS UNDER COLOR OF STATE LAW OF RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES.

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36.) THE COURTS HAVE JURISDICTION UNDER  
28 USC SECTION 1331 AND 1343

(A) (3) PLAINTIFF SEEKS DECLARATORY RELIEF  
PURSUANT TO 28 U.S.C.

37.) SECTION 2201 AND 2202 PLAINTIFF CLAIMS  
FOR INJUNCTIVE RELIEF ONE AUTHORIZED BY  
28 USC SECTION 2283 AND 2284 AND RULE  
65 OF THE FED. RULES OF CIVIL PROCEDURES.

38.) THE EASTERN DISTRICT OF VIRGINIA AND  
NORFOLK / NEWPORT NEWS DIVISION IS AN  
APPROPRIATE VENUE UNDER 28 U.S.C.  
SECTION 1391 (b) (2) BECAUSE IT IS

39.) WHERE THE EVENTS GIVING RISE TO THIS  
CLAIM OCCURRED.

40.) PLAINTIFF(S), TROY L. SMITH WAS AT ALL  
TIMES MENTIONED A PRISONER OF THE  
HAMPTON ROADS REGIONAL JAIL A FOR-  
PROFIT COUNTY JAIL / CORPORATION THAT  
OPERATES THE JAIL.



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41.) Plaintiff(s) Troy L. Smith is Confined  
At For-profit Pendleton Correctional Facility/  
4490 West Reformatory Road, Pendleton, IN  
46064. As A Interstate Compact Prisoner.

42.) Defendant DIRECTOR VA DOC:  
HAROLD CLARKE IS THE DIRECTOR OF THE  
Virginia DEPARTMENT OF CORRECTIONS.

43.) HAMPTON Roads Regional Jail, HE IS  
legally Responsible for the policy MAKER  
AND overall OPERATIONAL OF THE

44.) Hampton Roads Regional Jail A-profit Jail.

45.) Defendant DIRECTOR VA DOC HAROLD CLARKE  
Violated Plaintiff(s)

46.) FIRST Amendment INTERFERING OR  
Allow Defendants TO IMPERMISSIBLE DENY

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Plaintiff to Petition The Government For  
Redress of Grievances

47) And/or to Appeal Grievances to the  
higher Authority And exhaust Under  
P.L.R.A.

48) Violated Plaintiff Eight Amendment  
Cruel And Unusual punishment allowing  
Another inmate to Attack plaintiff who  
knew he was Unstable, hostile, Assaultive,  
Combative, And/or A history of Violence

49) Towards inmates And/or staff,  
denied to be put in medical housing do to  
injuries (Hit in Back of head with A  
Unsecured Food Tray), Result Swollen  
head, (Broken Wrist And/or Broken Bones).



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50.) Denied pain medication, denied proper procedure to see a specialist at a outside hospital on day of incident, Failure to protect from assault and denied to administer proper medical procedures after the attack from violent attack.

51.) Violated Plaintiff FOURTEENTH AMENDMENT denied equal protection of the law in protecting plaintiff from assault, that Defendants knew the inmate had a history of violent acts on inmates and /

52.) or staff and / or administer proper medical attention after attack.

53.) Defendants Superintendent John / Jane "DOE",  
Asst. Superintendent John / Jane "DOE", and  
Major Felicia Cowans Violated Plaintiffs

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54) FIRST Amendment Failure to Aid And Administer A proper Remedy of Grievance pertain to Assault on Plaintiff Under P.L.R.A.

55) Violated Plaintiff's EIGHT Amendment Cruel And Unusual punishment Having

56) personal knowledge of plaintiff injuries, FAIL TO TRAIN OFFICERS ON COMBATIVE INMATES WHO ASSAULT INMATES AND STAFF ALIKE, Failure TO TRAIN DEFENDANTS ON INMATE ASSAULT

57) And / or policy procedure of Hampton Roads Regional Jail, allowing medical to deny plaintiff medical services AFTER Assault, denied pain meds by

58) medical personnel, denied to be housed in medical unit AFTER injuries And / or allowing inmates who are violent



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RUN wild in A-profit Hampton Roads  
Regional Jail

59.) Violated Plaintiffs FOURTEENTH Amendment  
denied equal protection of the law in  
protecting Plaintiff on inmate Assault &  
Denied proper medical Attention AFTER  
assault.

60.) Defendant(s) (Capt) Chief of Security  
T. BARNES, Sgt. (UNIT Sergeant) STEVE WHITE-  
HEAD, Sgt. (UNIT Sergeant) T. EVERETTE,  
Sgt. (RECORDS) E. Herelle, Sgt. (UNIT Sergeant)  
— Johnson, C.O. (Pod OFFICER DAYS)  
— Budd And C.O. (Pod OFFICER NIGHTS)  
C. Anderson

61.) Violated FIRST Amendment Failure  
TO INVESTIGATE GRIEVANCE PERTAINING TO  
Assault, And / OR TO EXHAUST UNDER  
P.L.R.A.

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(62) Violated Eight Amendment Failure to Administer proper procedure on Assault pertain to plaintiff, denied to be moved out of population due to

(63) injuries, denied to follow Safety And Security procedure pertain to Violent inmates who Assault inmates And safe watch As plaintiff was Assaulted And/or never Administer.

(64) A Chemical Agent. Violated Fourteenth - Amendment Denied equal protection of the law protecting from Assault of Another inmate And proper procedure of housing.

(65) Defendant's Master Jail Officer (Classification) Perry, Sgt. (Classification) C. - Dickerson, And OFC. (Classification) - Insley Violated Fourteenth Amendment Denied equal treatment in housing pertaining to medical needs



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66.) DEFENDANT'S INTERNAL AFFAIRS LT. PHILLIPS  
AND COX VIOLATED FIRST AMENDMENT  
FAILURE TO ADDRESS GRIEVANCE PERTAIN  
TO INJURIES AND/OR UNDER P.L.R.A.

67.) VIOLATED FOURTEENTH AMENDMENT  
DENIED equal treatment OF SAFETY AND  
SECURITY OF THE PRISON PERTAIN TO INJURIES  
PLAINTIFF SUFFERED.

68.) DEFENDANT GRIEVANCE SPECIALIST - SGT.  
COPELAND VIOLATED FIRST AMENDMENT  
FAILURE TO ADDRESS GRIEVANCE PERTAIN TO  
INJURIES AND/OR FAILURE TO EXHAUST  
UNDER P.L.R.A.

69.) VIOLATED FOURTEENTH AMENDMENT  
DENIED equal protection in filing  
GRIEVANCE, INVESTIGATION AND/OR  
EXHAUST UNDER P.L.R.A.

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70) Defendants DIRECTOR OF NURSING

(DON) K. BARTON, Health Service Administrator

APRIL GREEN, (DOCTOR) DR. MERANO

RN (REG. NURSE) T. HARRIS, RN (REG. NURSE)

PHILIP, CERT. MED TECH "CMT" A. -

HARRISON, CHARGE NURSE John / JANE "DOE",

And Medical Security Supervisor LT. K. MACK

71) Violated EIGHT Amendment Deliberate

indifference to A prison condition that

expose A prisoner to A unreasonable

72) Risk of serious harm or deprives

plaintiff of A human need (pain

medication) pertain to injuries And / or

cruel And unusual punishment.

73) Violated FOURTEENTH Amendment Denied

equal treatment pertain to medical

needs.



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74.) Each Defendant is Sued individually And  
IN [His OR HER] official Capacity AT  
All times mentioned in This

75.) Compliant Each Defendant Acted Under  
the Color of State law

76.) V "FACTS"

77.) On OR About May 24, 2018  
plaintiff was housed in the Hampton -

78.) Roads Regional Jail in pool 3/2 C-Side.

79.) Defendant O.F.C. Buckl Was the on Duty/  
Day Shift pool OFFICER.

80.) During the Date of incident INMATE  
D. Johnson WAS Released from Seg-

81.) REGATTION And assigned to 3/2 Cside  
Cell C-202.

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82.) Defendant OFC. Budd CONTACTED Defendant Classification MTO. M. Perry, And had inmate

83.) D. Johnson, moved from C202 to C201.

84.) Sometime During the Day evening Hours Shift Change And Defendant OFC.

85.) C. Anderson was on Duty.

86.) Sometime During the Night Shift on Day of incident I the plaintiff WAS badly -

87.) Assaulted By inmate D. Johnson

88.) Inmate D. Johnson Suddenly STRUCK ME the plaintiff in the head with A

89.) Unsecured Food Tray.

90.) Inmate D. Johnson Slammed plaintiff back onto his Arm.



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91) DEFENDANTS OFFICER ANDERSON AND SGT. EVERETTE WAS PRESENT WITNESSES TO ATTACK.

92) DEFENDANT SGT. EVERETTE NEVER DURING ATTACK USED CHEMICAL AGENTS TO PREVENT FURTHER ATTACK.

93) PLAINTIFF WAS PLACED IN CELL AFTER BEING ATTACKED AND BEING INJURED.

94) PLAINTIFF WAS PLACED INTO A GYM AFTER BEING ATTACK AND HAVING INJURY.

95) PLAINTIFF WAS ESCORTED TO MEDICAL WHERE DEFENDANT ON DUTY CHARGE NURSE JOHN/JANE

96) "DOE", ACKNOWLEDGE BROKEN ARM DO. TO OBVIOUS DISFORMITY OF PLAINTIFF ARM.

97) DEFENDANT ON DUTY CHARGE NURSE JOHN/JANE "DOE" REFUSED TO CALL A MEDICAL ADMINISTRATOR,

98) OR PROVIDER.

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99.) Defendant on duty Charge Nurse John / Jane "DOE" refused to use better Judgement And GET

100.) plaintiff TO A Hospital, Defendant Charge Nurse John/Jane "DOE" Sent plaintiff back to housing

101.) UNIT with OUTSTANDING injuries.

102.) Plaintiff placed back into pod MAXIMUM SECURITY population.

103.) Plaintiff LEFT IN A (4) MAN Cell OVER NIGHT with injuries.

104.) Plaintiff escorted the following DAY TO medical TO SEE A DOCTOR Defendant

105.) DR. MERANO. Plaintiff was in bad pain ALL NIGHT And had little ASSISTANCE.

106.) Plaintiff was given X-rays And WAS SENT TO A Hospital.



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- 107.) Plaintiff learned how badly broken Arm WAS And had to wait days to receive Surgery.
- 108.) Plaintiff At Some point CONTACTED CLASSIFICATION via kiosk TO DEFENDANTS MTO. N. PERRY,
- 109.) SGT. C. DICKERSON, SGT. E. HERELLE TO ATTEMPT TO RELOCATE from population TO A SAFER
- 110.) Compatible housing while awaiting Surgery And when Completed.
- 111.) Plaintiff received A response from the CLASSIFICATION DEFENDANTS And denied
- 112.) RELOCATION. Plaintiff At Some point had CONTACTED And MET with the HAMPTON -
- 113.) Roads regional Jail INTERNAL AFFAIRS DEPT, DEFENDANT(S) LT. PHILLIPS And OFC. COX.
- 114.) Plaintiff Completed And Submitted Criminal COMPLIANT FORMS.

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115.) plaintiff was interviewed By A Portsmouth Police Officer Alexander

116.) To Talk About the incident And process the Criminal Complaints Against inmate D. Johnson.

117.) At Some point plaintiff filed A grievance based on Attack And injuries Sustained.

118.) Plaintiff Appealed grievance And it was assigned To Defendant Captain Barnes

119.) And Continued exhausting Remedies Another final Appeal was Sent

120.) To The facility Head Superintendant Defendant John / Jane "DOE" And

121.) Was intercepted And Responded To By Defendant Major. F. Cowans, which Was

122.) The institutional Final Remedy.



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123.)

LEGAL CLAIMS

124.) Plaintiff Reallege And incorporate By REFERENCE paragraphs 1-122.

125.) The Defendants AT THE HAMPTON ROADS Regional Jail VIOLATED Plaintiff -

126.) TROY C. Smith, FIRST, EIGHT, And FOURTEENTH Amendment Rights :

127.) Failure TO PROTECT Against INMATE ON INMATE Assault, Failure TO REMEDY

128.) A Wrong When A Known Risk. Failure TO INVESTIGATE Grievance.

129.) Medical Deliberate indifference TO A SERIOUS medical need.

130.) Refused Plaintiff TO be placed in proper housing do TO injuries.

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131.) Denied equal protection of the law And /  
OR Due process of law.

132.) Failure to Administer proper medication  
for ongoing pain while housed AT

133.) THE HAMPTON ROADS REGIONAL Jail.

134.) KNOWLEDGE AND ACQUIESCENCE

135.) DEFENDANTS: HAROLD CLARKE (VADOC DIRECTOR)  
(SUPERINTENDANT) JOHN / JANE "DOE" (HRRJ)  
(ASST. SUPERINTENDANT) JOHN / JANE "DOE" (HRRJ)  
(MAJOR) F. COWANS, (CAPTAIN) T. BARNES,  
S. WHITEHEAD (UNIT SERGEANT)  
T. EVERETTE (UNIT SERGEANT)  
E. HERELLE (CLASSIFICATION SERGEANT)  
JOHNSON (UNIT SERGEANT)

136.) MJO N. PERRY (MST Jail OFC - CLASSIFICATION)  
C. DICKERSON (CLASSIFICATION SERGEANT)



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137.) LT. Phillips (Lieutenant) INTERNAL AFFAIRS  
— Copeland (Sergeant) "Grievance Specialist"

138.) K. BARTON (DIRECTOR OF NURSING), A. GREEN  
(Health Service Administrator), DR. MERANO -  
(DOCTOR) (Charge Nurse) John / Jane "DOE"...

139.) LT. K. MACK (Lieutenant) "Medical Security  
Supervisor".

140.) UNDER SUPERVISOR OFFICIAL, (1) KNOW OF  
VIOLATIONS OF YOUR RIGHTS, (2) ARE IN A -

141.) POSITION TO CORRECT THEM AND (3) FAIL  
TO DO SO, THEY MAY BE FOUND TO HAVE -

142.) PERSONAL INVOLVEMENT AND RESPONSIBILITY  
FOR THE INJURIES YOU HAVE SUFFERED.

143.) THE HAMPTON ROADS REGIONAL JAIL BREACHED  
THE CONTRACT OF THE STATE OF VIRGINIA -

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144.) By Violating Plaintiff CONSTITUTIONAL  
Rights "FIRST, EIGHT, AND FOURTEENTH

145.) Admendment)"

146.) The plaintiff has NO plain, ADEQUATE OR  
COMPLETE Remedy AT law TO REDRESS THE

147.) Wrongs described HEREIN.

148.) PRAYER FOR RELIEF

149.) WHEREFORE, Plaintiff Respectfully  
prays THAT THIS COURT ENTER Judgement granting

150.) plaintiff:

151.) A DECLARATION THAT THE ACTS AND  
OMISSIONS described herein VIOLATED

152.) Plaintiffs Rights Under The CONSTITUTIONAL  
Rights And laws of The UNITED STATES.



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153.) Compensatory damages in the amount of  
\$ 15,000.00 Against Each defendant,

154.) Jointly And Severally.

155.) Punitive Damages in the Amount of  
\$ 15,000.00 Against Each Defendant.

156.) A JURY TRIAL ON ALL ISSUES TRIABLE  
By JURY.

157.) Plaintiff Cost in the suit.

158.) Any additional Relief This Court  
deems just, proper, And equitable,

159.) DATE: 3/19/20 / [Signature]  
Respectfully Submitted,

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TROY L. SMITH # 272086  
Pendleton Correctional Facility  
4490 WEST REFORMATORY ROAD  
Pendleton, IN 46064

VERIFICATION

I HAVE READ THE FOREGOING COMPLAINT AND  
HEREBY VERIFY THAT THE MATTERS ALLEGED  
THEREIN ARE TRUE, EXCEPT AS TO MATTERS  
ALLEGED ON INFORMATION AND BELIEF,  
AND AS TO THOSE, I BELIEVE THEM TO BE TRUE.  
I CERTIFY UNDER PENALTY OF PERJURY THAT  
THE FOREGOING IS TRUE AND CORRECT.

EXECUTED AT PENDLETON, INDIANA  
ON: 3/19/20

SIGNATURE:

TROY L. SMITH / [Signature]



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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA.

SUMMONIS

TROY L. SMITH  
PLAINTIFF,

CIVIL ACTION NO. \_\_\_\_\_

VS.

HAROLD CLARKE - DIRECTOR (VA DOC)

JOHN / JANE DOE - SUPERINTENDANT (HRRT)

JOHN / JANE DOE - ASST. SUPERINTENDANT (HRRT)

F. COWANS - MAJOR (HRRT)

T. BARNES - CAPTAIN HRRT

STEVE WHITEHEAD - SERGEANT (HRRT)

T. EVERETTE - SERGEANT (HRRT)

E. HERELLE - SERGEANT (HRRT)

\_\_\_\_ JOHNSON - SERGEANT (HRRT)

\_\_\_\_ BUDD - OFFICER (HRRT)

C. ANDERSON - OFFICER (HRRT)

N. PERRY - MASTER JAIL OFFICER (HRRT)

C. DICKERSON - SERGEANT (HRRT)

\_\_\_\_ INSLEY - OFFICER (HRRT)

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\_\_\_\_ Phillips - Lieutenant (HRRT)

\_\_\_\_ Cox - OFFICER (HRRT)

\_\_\_\_ Copeland - Sergeant (HRRT)

K. BARTON - DON (HRRT)

April GREEN - HSA (HRRT)

\_\_\_\_ Merano - DOCTOR (HRRT)

T. HARRIS - Reg NURSE (HRRT)

A. HARRISON - CMT (HRRT)

K. MACK - Lieutenant (HRRT)

\_\_\_\_ Phifer - Reg NURSE (HRRT)

John / Jane DOE - CHARGE NURSE (HRRT)

Individually And in there  
OFFICIAL CAPACITIES,  
Defendant(s)

TO THE ABOVE NAMED DEFENDANTS :

You ARE HEREBY SUMMONED AND REQUIRED TO  
SERVE UPON PLAINTIFFS whose Address is  
TROY L. SMITH # 272086, Pendleton  
CORRECTIONAL FACILITY 4490 West Reformatory Rd.  
Pendleton, IN 46064 AN ANSWER TO THE



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Compliant which is here with served upon you within 20 days after service of this summons upon you, exclusive of the day of service, or 60 days if the U.S. - Government or / officer / agent thereof is a defendant. If you fail to do so judgement by default will be taken against you for the relief demanded in the Compliant.

CLERK OF THE COURT

DATE: \_\_\_\_\_

F-6

**CERTIFICATE OF PRISONER ACCOUNT**

I, the undersigned, certify that Offender Troy Smith,  
DOC # 272086 has a current balance of \$ 56.62 in his prisoner trust account. I  
also certify that during the last six (6) months (or \_\_\_\_\_ months if prisoner has been confined less  
than six months) that the prisoner's average monthly BALANCE was \$ 19.62.

I further certify that I have attached a true and correct copy of the prisoner trust account  
statement for the last six months or for the duration of his confinement in the Department of  
Corrections.

Signed on date: 3/19/2020

  
\_\_\_\_\_  
Signature of Authorized Official

Caseworker T. Cochran  
Printed Name and Job Title  
Pendleton Correctional Facility